



April 13, 2016

VIA CM/ECF

The Honorable Cathy Seibel
Federal Building and
United States Courthouse
300 Quarropas St.
White Plains, NY 10601-4150

Re: Matter: **Justin Kracht v. Jo-Ann Stores, LLC**
Index No. 16-cv 2043 (CS)

Dear Judge Seibel:

This firm represents Defendant Jo-Ann Stores, LLC, in the above matter. Kindly accept this as Defendant's letter-motion seeking an extension of the deadline for Defendant to answer or otherwise respond to the Complaint. Pursuant to Section I (E) of Your Honor's individual practices: (1) the complaint was initially served on Jo-Ann Stores, LLC on or about March 21, 2016, making the deadline to respond to the complaint April 12, 2016; (2) there have been no previous requests for extensions or adjournments; (3) we seek this extension to fully review the background of this matter; and (4) Plaintiff's counsel has consented to this request to extend the deadline to May 2, 2016. Attached hereto as Exhibit A is a proposed consent order.

Thank you for your consideration of this request.

Respectfully submitted,

LECLAIRRYAN


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